

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MANUEL MEDINA, AGUSTIN §

MARTINEZ, Individually and On
Behalf of All Similarly Situated Persons,
Plaintiffs,

V. § CIVIL ACTION NO. 4:15-cv-1320

PRO OILFIELD SERVICES, LLC, f/k/a
MAXX OILFIELD SERVICES, LLC,
Defendant. §

JURY DEMANDED

AND

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JASON ARAGON, Individually and On §
Behalf of All Similarly Situated Persons,
Plaintiffs,

V. § CIVIL ACTION NO. 4:15-cv-2734

PRO OILFIELD SERVICES, LLC,
Defendant. §

JURY TRIAL DEMANDED

**JOINT MOTION TO FILE MOTION FOR
APPROVAL OF FLSA SETTLEMENT UNDER SEAL**

Plaintiffs Manuel Medina, Agustin Martinez and Jason Aragon (“Plaintiffs”) and Defendant Pro Oilfield Services, LLC (collectively, the “Parties”) have entered into a confidential settlement agreement, which will be filed under seal if the Court grants this Motion. The Parties have agreed to submit the Settlement Agreement and the Motion for Approval of FLSA Settlement under seal for the Court’s in camera review.

In camera review is appropriate because without such confidentiality, there is an increased likelihood that Defendant would be exposed to further litigation (on claims that they

deny), thus depriving Defendant of a benefit which was the basis for the settlement bargain. There is also a public interest in confidentiality in that it encourages and facilitates settlement negotiations, thereby preserving the resources of the Court. No potential claimant is disadvantaged by such confidentiality. As there is no prejudice arising from in camera review but great prejudice should such review be denied, it should be permitted.

In accordance with the Parties' agreement, the Parties respectfully ask this Court to grant leave to file their Settlement Agreement and the Motion for Approval of FLSA Settlement under seal.

Respectfully submitted,

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